

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNIFER CAMACHO,
JENNIFER CAMACHO as next best friend of
JASMIN E. VELEZ, and
JENNIFER CAMACHO as next best friend of
DANIEL VELEZ,

Plaintiffs,

C.A. NO.: 1:19-cv-10378-RWZ

vs.

HANNAH ROBBINS and MICHAEL ROBBINS,

Defendants.

DEFENDANTS' INITIAL DISCLOSURES

Pursuant to and in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, the defendants, Hannah Robbins and Michael Robbins, provides to the plaintiffs the following initial disclosures based on the information currently and reasonably available to the defendants:

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

1. Jennifer Camacho, 96 Pond Street, Framingham, Massachusetts.
2. Jasmin E. Velez, 96 Pond Street, Framingham, Massachusetts.
3. Daniel Velez, 96 Pond Street, Framingham, Massachusetts.
4. Hannah Robbins, 475 Lane Road, Chester, New Hampshire.
5. Michael Robbins, 475 Lane Road, Chester, New Hampshire.

The above-listed individuals are likely to have discoverable information concerning the underlying facts and circumstances surrounding the accident that gives rise to this action.

B. DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS

1. None at this time.

C. COMPUTATION OF DAMAGES

Not applicable.

D. INSURANCE AGREEMENT(S)

Defendants, Hannah Robbins and Michael Robbins, are provided optional bodily injury coverage in the amounts of \$250,000.00 per person and \$500,000.00 per accident, that would apply to any judgment in favor of the plaintiffs.

A copy of defendants' declaration of coverage selection page will be provided by way of supplement.

Respectfully submitted,
Defendants,
Hannah Robbins and Michael Robbins,
By their attorney,

/s/ David M. Lentini, II

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Dated: May 31, 2019

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants this 31st day of May, 2019.

John Lee Diaz, Esq.
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801C Tremont Street
Boston, MA 02118

/s/ David M. Lentini, II

David M. Lentini, II, Esq.